

Coleman, Duane L.

From: Ross Hutchison <RHutchison@smithcashion.com>
Sent: Wednesday, June 01, 2016 3:53 PM
To: Coleman, Duane L.; Goerisch, C. David
Cc: jbradshaw@wyattfirm.com; Greg Cashion
Subject: Western Amended Discovery Responses
Attachments: 20160601155557265.pdf

Gentlemen:

Attached please find the Amended Responses of Western Surety. A copy is also being sent via U.S. Mail.

In hopes of assisting you in your review of the amended responses and referencing the proposed Joint Statement:

No.1 has been addressed

No.2 has been addressed.

No.3 – Western maintains its position that it provided the documents as they have been kept in the usual course of business. It is Western's position that the records produced fall under 34(b)(2)(E)(i), and the amount of documents are not substantial or burdensome to review.

No.4. – Western has provided reference to Exhibit A as well as additional substantive remarks.

No.5 - Western has provided additional explanation for No.11 and No.16.

No.6. - Western has provided additional explanation.

No.7 - Western maintains its position that it provided the documents as they have been kept in the usual course of business. It is Western's position that the records produced fall under 34(b)(2)(E)(i), and the amount of documents are not substantial or burdensome to review.

RPDs

No.1 has been addressed.

No.2 has been addressed.

If you have any questions or concerns, please do not hesitate to contact me directly.

J. Ross Hutchison



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**Exhibit
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